

**REMARKS**

Claims 6-31 are pending in the instant application. All claims presently stand rejected. Claims 6, 14, and 21 are amended herein. Entry of this amendment and reconsideration of the pending claims are respectfully requested.

*Claim Rejections - 35 U.S.C. § 103*

Claims 6-31 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Papa et al. (US 6,324,608 B1) in view of Eide et al. (US 6,529,978 B1).

"To establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. All words in a claim must be considered in judging the patentability of that claim against the prior art." M.P.E.P. § 2143.03.

Amended independent claim 6 now recites, in pertinent part,

wherein the first and second network interfaces are both coupled to insert data received from the processor and the first peripheral device, respectively, into the packetized messages prior to transmitting the data onto the communications link and to extract the data from the packetized messages received from the communications link prior to providing the data to the processor and the first peripheral device, respectively.

Applicants respectfully submit that the cited prior art fails to disclose network interfaces associated with a processor and a peripheral device both coupled to insert and extract data from packetized messages transmitted on a communication link between the processor and its peripheral device.

The Examiner acknowledges that Papa fails to disclose using packetized messages to communicate between a processor and a peripheral device. *Office Action* mailed November 30, 2004, page 3. However, the Examiner cites Eide as teaching this element and relies on the portion of Eide which states,

an interface to a network 22 may be provided, e.g., to provide communications capability using any number of network protocols (e.g., IPX, TCP/IP, SNA, etc.)."

*Eide*, col. 5, lines 10-14. The Examiner has stated, "Furthermore, at col. 8, lines 23-50, Eide discloses the bus manager IOA/IOP to take ownership via command to hardware driver. This implies packetized." *Office Action* mailed November 30, 2004, page 9.

However, the presence of BUS MANAGER 56 in FIG. 3 of Eide actually implies that the system I/O bus is in fact a regular system bus—not a packetized message based communication link. Eide states,

A bus manager component 56 handles control of a system I/O bus component 58, which coordinates the low level communications within I/O interface 16.

This portion of Eide does not state that a network interface associated with processor 12 and a network interface associated with I/O interface 16 or any of IOPs 44 insert and extract data into/from packetized messages prior to transmitting the data over system I/O bus 18 between processor 12 and an IOP 44. In fact, Eide clearly states that

External communication with apparatus 10 is handled through an input/output (I/O) interface 16 coupled to processing complex 11.

*Eide*, col. 4, lines 34-35 (Emphasis added). Thus, I/O interface 16 communicates with external network 22 using packets, but Eide does not disclose I/O interface 16 or IOPs 44 inserting data received externally from computer 10 into a packetized message, which is then communicated to a network interface of processor 12, which extracts the data from the packetized message and provides the data to the processor.

In the Response to Amendment section of the Office Action mailed May 18, 2005, the Examiner stated,

... Examiner already explained that external communication (peripheral devices) with apparatus 10 (system) is handled through an input/output (I/O interface 16) coupled and implemented by the processing complex 11 (included processor 12) and the communication between the external devices and systems is handled through interface 16 and processor 12 via transmitting/receiving commands on the system (the commands implementations/configurations by softwares wrapped up with packet as a whole to transmit from one device to another which included data a header containing an identification number source and destination addresses) so this implies packetized which is equivalent to applicant's claimed as using packetized.

However, the mere fact that apparatus 10 communicates externally using packets does not teach or suggest a peripheral device and a processor both having network interfaces that insert and extract data into/from packetized messages for communication between the processor and the peripheral device.

In other words, Eide does not teach or suggest a method or hardware to do the follow:

- (a) a processor providing data to a first network interface,
- (b) the first network interface separating the data into packetized messages,
- (c) the network interface transmitting the packetized messages over an internal communication link to a second network interface associated with a peripheral device of the processor,
- (d) the second network interface extracting the data from the packetized messages,
- (e) and the second network interface providing the data to the peripheral device.

Consequently, the combination of Papa and Eide fails to teach or suggest all elements of claim 6, as required under M.P.E.P. § 2143.03. Independent claims 14 and 21 include similar nonobvious elements as independent claim 6. Accordingly, Applicants request that the instant §103(a) rejections of claims 6, 14, and 21 be withdrawn.

Dependent claims 7-13, 15-20, and 22-31 are nonobvious over the prior art of record for at least the same reasons as discussed above in connection with their respective independent claims, in addition to adding further limitations of their own. Accordingly, Applicants respectfully request that the instant § 103 rejections for claims 7-13, 15-20, and 22-31 be withdrawn.

### CONCLUSION

In view of the foregoing amendments and remarks, Applicants believe the applicable rejections have been overcome and all claims remaining in the application are presently in condition for allowance. Accordingly, favorable consideration and a Notice of Allowance are earnestly solicited. The Examiner is invited to telephone the undersigned representative at (206) 292-8600 if the Examiner believes that an interview might be useful for any reason.

**CHARGE DEPOSIT ACCOUNT**

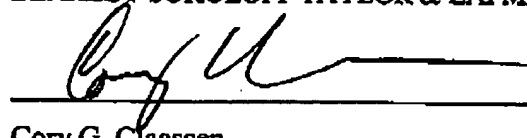
It is not believed that extensions of time are required beyond those that may otherwise be provided for in documents accompanying this paper. However, if additional extensions of time are necessary to prevent abandonment of this application, then such extensions of time are hereby petitioned under 37 C.F.R. § 1.136(a). Any fees required therefore are hereby authorized to be charged to Deposit Account No. 02-2666. Please credit any overpayment to the same deposit account.

Respectfully submitted,

BLAKELY SOKOLOFF TAYLOR & ZAFMAN LLP

Date:

July 5, 2005



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